From: Henning, Alan

**To:** Wu, Jennifer; Peterson, Erik; Helder, Dirk; Woodruff, Leigh; Parry, Roberta; Rueda, Helen; Flahive,

Katie

**Sent:** 6/17/2014 2:49:44 PM

Subject: RE: CZARA matrix and Summary to Comments Documents

Attachments: Reference Documents.docx

## Folks,

Attached is an example of a table to use in compiling the reference documents that the commenters used in their letters.

Please let me know if you have any questions.

## Alan

From: Wu, Jennifer

**Sent:** Monday, June 16, 2014 3:10 PM

To: Peterson, Erik; Helder, Dirk; Woodruff, Leigh

Cc: Henning, Alan

**Subject:** FW: CZARA matrix and Summary to Comments Documents

Hi Everyone – Alan did a nice job in organizing his subgroup on riparian buffers, so I decided to use the same process.

Erik and Leigh, you'll see this is almost identical to an email you got from Alan with a few adjustments. We can look at these attachments tomorrow to go over how this process works. We can also go over assignments on comments. Talk to you all tomorrow, and thanks again for the help! - Jenny

As you all know, EPA/NOAA received around 85 comment letters and over 800 documents in response to the agencies' proposed decision to disapprove Oregon's Coastal Non-point Pollution Control Program. Several review teams have been established to review the comments. You all have agreed to (or have been drafted to) be part of the review team tasked with reviewing comment letters that address Forestry or Ag/Pesticides issues.

Of the 85 comment letters, approximately 36 commented on Forestry or Ag/Pesticides. The following are instructions to help guide us in our review process. We may want to make adjustments as we move forward. Things are not set in stone.

Step 1: Review NOAA/EPA's December 20, 2013 Proposed Decision Document to disapprove Oregon's Coastal Non-point Pollution Control Program. This will provide you some background info. on the decision. Pay close attention to the section on Forestry. The document is attached.

Step 2: Review the attached XL. spreadsheet. This is our foundation or framework for reviewing the comment letters and logging issues raised in the letters. The existing spreadsheet represents a "500-1000" foot level review completed by some members of our CZARA core team. The spreadsheet includes a listing of all of the comment letters (with the exception of the State of Oregon's letter), the entity submitting the letter, a summary of key points, and other pertinent information. As reviewers of the Forestry or Ag/Pesticides letters, we will need to make sure ALL of the KEY comments are logged in the spreadsheet. The "500-1000" foot level review didn't capture all of the points in some cases. We want to make sure all of the key points are captured. I've color-coded the pesticide-related comments: orange — forestry/pesticides; green — ag/pesticides; yello — general or both/pesticides.

Step 3: Review the comment letters: All of the comment letters can be found at NOAA's web site. The link is <a href="http://coastalmanagement.noaa.gov/nonpoint/oregonDocket/publicComments.html">http://coastalmanagement.noaa.gov/nonpoint/oregonDocket/publicComments.html</a>. As I previously mentioned, we have at least 36 letters to review. Based on size and complexity, I have divided the letters into three categories: simple, moderately complex and complex. (remember, "complexity" is based on the "eye of the beholder"). I

ED\_454-000320574 EPA-6822\_023750

will be assigning specific letters to reviewers considering team members' current workload and schedules. I'll be sending our assignments later today. When reviewing a letter, please compare your findings with information included in the spreadsheet. If you find that a key comment from a specific letter was not included in the spreadsheet, please make the addition to the spreadsheet following the numbering sequence that exists for that letter. For example comment letter "4" currently has three comments listed -- 4-A, 4-B and 4-C. If you add a comment, your addition would be listed as 4-D. Make sure you identify the addition by including your initials. You could color code the addition as well. If you find that the "500-1000" foot level comment is not accurate, note the correction in the spreadsheet next to the inaccurate comment. Make sure you initial/color code your findings as well.

Step 4: Make a listing of all of the references used by commenters in the comment letters. I suggest creating a separate word document for the references. The "references" word document should include 1) the comment letter number (for example-- Letter 4), 2) the number of the specific Key comment (4-C), and 3) the name of the reference document. I will be compiling the "reference" word documents from all of the reviewers. This compiled document will be given to TetraTech. Tetra Tech will obtain the reference documents (we will need them for our records), will review the specific comment where a reference document was used, and will ensure that the reference document was accurately interpreted/used.

Step 5: Summarize the responses to comments: From the matrix, we will need to summarize all of the comments received from all of the commenters (Pesticide Commenters). To do this, we will group comments as appropriate, and code the specific comment letters to the comment. Attached to this e-mail is a word document that shows how this will be done. We will add our summary comments to this document. I will schedule a conference call before we start this step to make sure we are all together at this point.

Talk to you all tomorrow, Jenny